

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	NO. 4:23-CR-159
	:	
CEDRIC LODGE, KATRINA	:	CHIEF JUDGE BRANN
MACLEAN, JOSHUA TAYLOR	:	
and DENISE LODGE	:	
	:	
Defendants.	:	
	:	ELECTRONICALLY FILED

**AGREED MOTION TO CONTINUE DEADLINE TO FILE PRETRIAL
MOTIONS, JURY SELECTION AND TRIAL**

Defendant Cedric Lodge, by and through his undersigned counsel, hereby moves for a continuance of the deadline to file pretrial motions, jury selection and trial date and, in support thereof, avers as follows:

1. On June 16, 2023, a five-count Indictment was entered against Defendant Cedric Lodge. (ECF 1)
2. On June 16, 2023, the undersigned counsel entered their appearance on behalf of Cedric Lodge. (ECF 22)
3. On June 27, 2023, Cedric Lodge was arraigned, entered a plea of not guilty, and was released on his own recognizance. (ECF 31)

4. On February 6, 2024 the Court entered an Order scheduling trial for August 5, 2024, and ordering that pretrial motions be filed on or before July 1, 2024. (ECF 68.)

5. Counsel for the Defendant underwent a septoplasty procedure on Tuesday, June 25, 2024. The surgery was more extensive than expected and more recovery time is needed.

6. In light of the above, Defendant requests that the pre-trial motion deadline be continued for at least one hundred twenty (120) days and the trial to be continued in accordance with that date.¹

7. Defense counsel avers that the ends of justice served by granting this continuance outweigh the interest of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

8. Further, failure to grant the instant request would deny Defendant competently prepared counsel and would result in a miscarriage of justice. *See* 18 U.S.C. §§ 3161(h)(7)(B)(i); 3161(h)(7)(B)(ii).

¹ Co-Defendant Joshua Taylor, by and through his counsel Christopher Opiel, filed a Motion for Enlargement of Time to File Pretrial Motions and Continuance of Trial on June 27, 2024 (ECF 89), citing the significant quantity of discovery that has been disclosed and that the parties are in the discovery process. As indicated in that motion, undersigned counsel concurred in the relief requested and the proposed form of Order attached to the instant motion is consistent.

9. Counsel has sought the concurrence of Assistant U.S. Attorney Sean Camoni in this request. Mr. Camoni concurs in the motion.

10. Pursuant to Local Rule 7.5, no supporting brief is required because the reasons for the continuance are fully stated in the motion and the Government concurs in the relief requested.

WHEREFORE, Defendant Cedric Lodge respectfully requests that the deadline to file pretrial motions be continued for at least one hundred twenty (120) days and the trial to be continued in accordance with that date.

Respectfully submitted,

/s/ Patrick A. Casey
Patrick A. Casey

Attorney for Defendant, Cedric Lodge

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Date: June 28, 2024

CERTIFICATE OF SERVICE

I, Patrick A. Casey, hereby certify that a true and correct copy of the foregoing Agreed Motion to Continue Deadline to File Pretrial Motions, Jury Selection and Trial was served upon the following counsel of record via the Court's ECF system on this 28th day of June 2024:

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